

ANNUAL REPORT
on the
AIR TOXICS HOT SPOTS PROGRAM
JULY 28, 2010

INTRODUCTION: The Air Toxics "Hot Spots" Information and Assessment Act of 1987 is a State of California public right-to-know law requiring air quality management and air pollution control districts to collect information about the location, type, and quantity of toxic compounds emitted into the air from local businesses. Section 44363 of the California Health and Safety Code requires the District to prepare an annual report describing priorities and categories used to assess emissions and to summarize the results and progress of the health risk assessment program. This report covers the period from July 1, 2009 through June 30, 2010, and summarizes the District's efforts to implement the Air Toxics Hot Spots (ATHS) Program.

THE PROGRAM: The District has been implementing the ATHS Program since its adoption. Sources known to emit toxic compounds, large sources of criteria pollutants and sources described by certain standard industrial codes were required to submit toxic emission inventory plans (TEIP). The TEIP described which toxic compounds were released and how they would be quantified. After the District reviewed and approved each plan, sources subject to the Program were required to submit a toxic emission inventory report (TEIR) which listed each compound emitted according to the device, stack or release point and identified the maximum hourly and annual emissions in pounds.

The District reviewed each TEIR and determined a prioritization score according to the California Air Pollution Control Officer's Association (CAPCOA) Prioritization Guidelines. Sources with prioritization scores equal to or less than one (1.0) were exempted from the ATHS Program. If the prioritization score was equal to or greater than 1.0, but less than 10.0, the source was maintained as an intermediate level or "District Update" facility. Sources with prioritization scores exceeding ten (10.0) were required to submit a health risk assessment (HRA) to the District.

An HRA is a health conservative estimate of the potential excess cancer risk that could result from exposure to the emitted compound(s) for 24 hours per day for 70 years. The HRA also assesses short term or acute exposure and long term or chronic exposure impacts from non-cancer causing substances. After District review, the HRA is forwarded to the State Office of Environmental Health Hazard Assessment (OEHHA) for further review.

A source with a risk of less than one (1.0) in-a-million and health hazard indices of less than one tenth (0.1) is exempt from the Program, regardless of prioritization score. Sources with a prioritization score greater than 10, a risk greater than 10.0 in-a-million, or health hazard indices greater than 1.0 are considered to be a State Tracking Facility.

If an HRA were to indicate a potential cancer risk of ten (10.0) in-a-million or greater or a health hazard index for chronic or acute non-cancer health impacts of greater than one (1.0), the emission source would be required to notify the impacted neighborhood and to submit a risk reduction audit and remediation plan. The risk reduction plan specifies how the source would reduce their risk to below the notification thresholds. After District approval, the source would have up to five years to make the changes, depending on the health impact and availability of equipment to reduce the risk. To date, none of the HRAs submitted for local sources and reviewed by the District have triggered the public notification requirement.

One exception to the above process is made for "industry-wide" category sources, which include crematories, dry cleaners, auto body shops, gasoline dispensing facilities, hospitals using ethylene oxide sterilizers, printers, and wastewater treatment facilities. Instead of having the individual source submit a plan and report, the District completes a screening risk assessment for each qualifying industry-wide source based on annual emission inventory submittals.

Most of the local industry-wide sources were evaluated based on their emission inventory submittals. Results indicated that all crematories, auto body shops, hospitals using ethylene oxide sterilizers, printers, and wastewater treatment facilities in the District were exempt from the ATHS Program, as prioritization scores were less than 1.0. All gasoline dispensing facilities received prioritization scores less than 1.0 but preliminary conservative risk screening has shown that twelve service stations may need additional analysis. Dry cleaning and gasoline dispensing facilities are still under evaluation pending approval of the CAPCOA industry-wide risk assessment guidelines for dry cleaning facilities and finalization of State guidelines for risk reduction audits and plans for both source types.

Newly installed or modified facilities are not subject to the ATHS Program as long as they are incorporated in the District's permit program, evaluated for risk, and an Authority to Construct and/or Permit to Operate is issued by the District for the new or modified equipment. Risk is evaluated for new and modified facilities in accordance with District Rule 219, Toxics New Source Review.

Emission Inventory Criteria and Guidelines Regulation: The AB2588 Air Toxics "Hot Spots" Emission Inventory Criteria and Guidelines Regulation was recently amended to incorporate reporting requirements for diesel particulate matter from stationary diesel engines. New engine installations and most existing standby engines requiring a permit have been evaluated through toxic new source review. However, some facilities with toxic emissions from other source types will need to add the risk from diesel engines to their existing risk evaluation. In addition, multiple engine facilities may need to submit toxic emission inventory plans and reports and evaluate the risk from diesel engines with a screening or refined risk assessment.

The Emission Inventory Criteria and Guidelines also requires emission inventory reporting for agricultural diesel engines starting January 1, 2012. The District currently has over 240 registered agricultural engines. A full year of recordkeeping for 2012 will be necessary in order to screen agricultural facilities for diesel risk impacts.

Control Measures: The District is currently permitting stationary and portable diesel engines subject to State Airborne Toxic Control Measures (ATCMs). The District continues to implement and enforce all existing ATCMs that apply to stationary sources.

Toxic Risk Management Plan: District staff have been working on a Toxic Risk Management Plan (TRMP) to provide a roadmap for future ATHS and related air toxic activities, including CEQA project review, rule development, mapping, and implementation of local, state and federal toxic regulations. The TRMP includes 28 toxic control strategies and the first draft is complete. When the TRMP is finalized it will be integrated into the next update to the Clean Air Plan, which will focus on multiple pollutants including particulate matter, ozone precursors, green house gases and toxic air contaminants.

For further information, contact Paul Reitz at (805) 781-5912.